

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

**In re:** Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Ricardo Cancel Serrano  
a/k/a Ricardo C. Serrano  
a/k/a Ricardo Abdiel Cancel Rivera  
a/k/a Ricardo Cancel  
a/k/a Ricardo C. Serrano-Serrano

**Debtor 1**

Sheila Mari LaBoy  
p/k/a Sheila Mari LaBoy Aguiar

**Debtor 2**

West York Borough  
**Movant(s)**

v.

Ricardo Cancel Serrano  
a/k/a Ricardo C. Serrano  
a/k/a Ricardo Abdiel Cancel Rivera  
a/k/a Ricardo Cancel  
a/k/a Ricardo C. Serrano-Serrano  
Sheila Mari LaBoy  
p/k/a Sheila Mari LaBoy Aguiar

**Respondent(s)**

Charles J. DeHart, III, Esquire  
Standing Chapter 13 Trustee  
**Additional Respondent**

**Chapter 13**

**Case No.** 1:17-BK-05157-HWV

**Matter:** Motion for Relief from the Automatic Stay

**Document No.** 36

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION  
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Ricardo Cancel Serrano and Sheila Mari LaBoy, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.

9. Admitted.

10. Admitted. Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.

11. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph 11; therefore, it is denied.

12. Admitted.

13. Admitted.

14. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph 14; therefore, it is denied.

15. Paragraph 15 contains a conclusion of law to which no response is required.

16. Paragraph 16 contains a conclusion of law to which no response is required.

17. Paragraph 17 contains a conclusion of law to which no response is required.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,  
**DETHLEFS PYKOSH & MURPHY**

Date: November 30, 2020

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire  
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Camp Hill, PA 17011  
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*Attorney for Debtor(s)*

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**CERTIFICATE OF SERVICE**

I hereby certify that on Monday, November 30, 2020, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay** in this proceeding via electronic means upon the following:

Craig Sharnetzka, Esquire  
CGA Law Firm  
135 North George Street  
York, PA 17401  
*Counsel for Movant(s)*

Charles J. DeHart, III, Esquire  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

Office of the United States Trustee  
Ronald Reagan Federal Building  
228 Walnut Street, Room 1190  
Harrisburg, PA 17101

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.  
Paralegal for Paul D. Murphy-Ahles, Esquire